

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER: 09-3617 JKS

EMENIKE CHARLES NWANKWOALA

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Count 1: On or about August 21, 2009, the defendant, Emenike Charles Nwankwoala, did willfully export and cause to be exported from the United States to Nigeria, defense articles listed on the United States Munitions List, without having first obtained from the DDTC a license or other written authorization for such export, in violation of 22 U.S.C. §2778(b)(2).

Count 2: On or about October 7, 2008, the defendant, Emenike Charles Nwankwoala, in connection with the acquisition of a Bersa, Model Thunder, .40 caliber pistol, bearing serial number 939089, a firearm, from Bel Air Gun Supply and Pawn, a licensed dealer, knowingly made a false and fictitious written statement which was intended and was likely to deceive Bel Air Gun Supply and Pawn as to a fact material to the lawfulness of the defendant's acquisition of the firearm under Chapter 44 of Title 18, in that the defendant represented that he was the actual purchaser of the firearm, when in fact, as the defendant well knew, he was purchasing the firearm on behalf of another person, in violation of 18 U.S.C. § 922(a)(6).

I further state that I am, a Special Agent for Immigration and Customs Enforcement and that this Complaint is based upon the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part thereof: ☐ Yes ☐ No

Melinda LeCompte

Affiant

Melinda LeCompte

U.S. Department of Homeland Security
Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence,

10/8/09
Date Issued

at Greenbelt, Maryland

Jillyn K. Schulze
Signature of Judicial Officer

Jillyn K. Schulze

United States Magistrate Judge